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14  
 15 **IN THE UNITED STATES DISTRICT COURT**  
 16 **FOR THE DISTRICT OF ARIZONA**

17 IN RE: Bard IVC Filters Products Liability  
 18 Litigation,

19 No. 2:15-MD-02641-DGC

20 This Document Relates to:  
 21 Debra Tinlin, et al. v. C. R. Bard, Inc., et al.  
 22 CV-16-00263-PHX-DGC

23 **DEFENDANTS' NOTICE OF**  
**LODGING UNDER SEAL**  
**CERTAIN EXHIBITS IN**  
**SUPPORT OF BARD'S TRIAL**  
**BRIEF ON THIRD PARTY**  
**FAULT**

23 Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively  
 24 "Bard"), pursuant to the Stipulated Protective Order (Doc. 269), Federal Rule of Civil  
 25 Procedure 26(c)(1)(G), and Local Civil Rule 5.6 file this notice of lodging under seal  
 26 certain exhibits attached in support of Bard's Trial Brief on Third Party Fault. These  
 27 exhibits contain certain Plaintiffs' personal healthcare information that is protected under  
 28 HIPAA and confidential under the Stipulated Protective Order. Defendants have notified

1 Plaintiffs of their intent to file this Notice of Lodging. Because the documents lodged  
2 under seal only relate to Plaintiffs' personal healthcare information, Defendants note that  
3 it is Plaintiffs' burden to file a motion to seal. A list of the Exhibits sought to be sealed are  
4 attached hereto as Exhibit A.

5 RESPECTFULLY SUBMITTED this 12th day of April, 2019.

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## **EXHIBIT A**

**DOCUMENTS PROPOSED TO BE FILED UNDER SEAL**

Defendants request they be permitted to file under seal the following documents:

## Exhibit A: Excerpts from January 30, 2019 Deposition of Dr. McMeeking

## Exhibit C: Expert Report of Dr. Sobieszczyk